

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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IN RE: AMERICAN EXPRESS ANTI-STEERING
RULES ANTITRUST LITIGATION

11-MD-02221 (NGG) (RER)

This Document Relates To:
CONSOLIDATED CLASS ACTION


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**NOTICE OF MOTION AND MOTION
TO ADMIT COUNSEL PRO HAC VICE**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto we will move this Court before the Honorable Nicholas G. Garaufis at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts of the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Reinhardt Wendorf & Blanchfield and a member in good standing of the Bar of the State of Minnesota, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Plaintiff.

Dated: April 16, 2014

Respectfully submitted


Mark A. Wendorf
Reinhardt Wendorf & Blanchfield
E1250 First National Bank Bldg.
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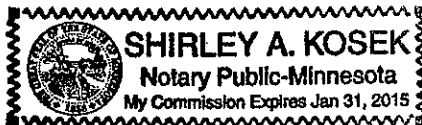
IN RE: AMERICAN EXPRESS ANTI-STEERING
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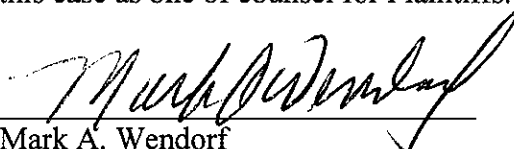
**AFFIDAVIT OF MARK A.
WENDORF IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC VICE**

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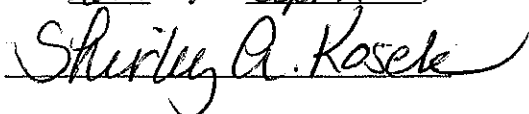
I, Mark A. Wendorf, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Reinhardt Wendorf & Blanchfield.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Minnesota.
4. There are no pending disciplinary proceedings against me in any State or Federal court.
5. WHEREFORE affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this case as one of counsel for Plaintiffs.




Mark A. Wendorf
Reinhardt Wendorf & Blanchfield
E1250 First National Bank Bldg.
St. Paul, MN 55101
Telephone: 651-287-2100
Email: m.wendorf@rwblawfirm.com

Subscribed and sworn to before me
This 16th day of April, 2014



**STATE OF MINNESOTA
IN SUPREME COURT**

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

MARK A WENDORF

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

April 22, 1986

Given under my hand and seal of this court on

April 15, 2014



A handwritten signature in black ink, appearing to read "Margaret Fuller Corneille".

Margaret Fuller Corneille
Office of Lawyer Registration